



Michael B. Homer
(617) 693-9732
mhomer@dynamisllp.com

June 17, 2025

By ECF

The Honorable Jesse M. Furman
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: Christopher DiFonzo v. Unicoïn, Inc. and Alex Konanykhin

Dear Judge Furman:

Defendants Unicoïn, Inc. (“Unicoïn”) and Alex Konanykhin (jointly, “Defendants”) respectfully submit this consented-to request for (1) an extension of time for Unicoïn to respond to the amended complaint, and (2) an adjournment of the initial pretrial conference presently set for July 2, 2025 (Dkt. 9). These are the first requests for an adjournment or extension made by either Defendant. Plaintiff Christopher DiFonzo through counsel consents to both requests.

Plaintiff filed his original complaint on March 31, 2025 (Dkt. 5). On April 1, 2025, the Court noticed an initial pretrial conference for July 2, 2025 (Dkt. 9). On April 3, 2025, Plaintiff filed an amended complaint (Dkt. 13). On April 15, 2025, Plaintiff served the amended complaint on Unicoïn, but not Mr. Konanykhin (Dkt. 14). Unicoïn’s response was due May 6, 2025, but Unicoïn had not yet retained counsel in this matter.

The undersigned filed a Notice of Appearance in this case yesterday, June 16, 2025, to represent both Defendants. Mr. Konanykhin, through counsel, has agreed to waive service of the amended complaint. Mr. Konanykhin’s deadline for responding to the amended complaint is August 12, 2025.

Defendants now respectfully request, with Plaintiff’s consent, that the Court extend the deadline for Unicoïn to respond to the amended complaint until August 12, 2025, to coincide with Mr. Konanykhin’s deadline for responding to the amended complaint.

Defendants also respectfully request, with Plaintiff’s consent, that the Court adjourn the initial pretrial conference presently set for July 2, 2025, for at least one week, as the undersigned, who filed a Notice of Appearance in this matter yesterday, has a preplanned vacation scheduled the week of July 2, 2025, and will be unavailable to appear for the conference on that date.

Respectfully,

/s/ Michael B. Homer

Michael B. Homer

DYNAMIS LLP

225 Franklin Street, 26th Floor

Boston, MA 02110

(t) 617-693-9732

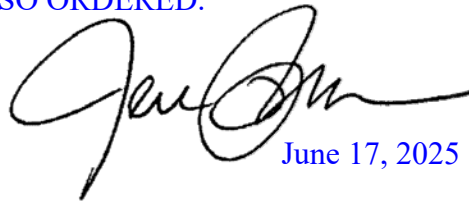
mhomer@dynamisllp.com

Counsel for Defendants

CC: Counsel of Record

Application GRANTED. The initial pretrial conference previously scheduled for July 2, 2025, is hereby ADJOURNED to **July 16, 2025 at 9:00 a.m.** The Clerk of Court is directed to terminate ECF No. 17.

SO ORDERED.

A handwritten signature in black ink, appearing to be "J. J. [unclear]", is written over the text "SO ORDERED." and the date "June 17, 2025".

June 17, 2025

DYNAMIS LLP

225 Franklin Street, 26th Floor | Boston, MA 02110 | (t) 617-693-9732